

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

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Pshatria LaRose

Plaintiff

v. Sean Combs

CIROC

Combs Enterprises INC

Defendant

THE SEAN COMBS FOUNDATION

3-24CV2242-L

Civil Action No.

COMPLAINT

Please see document attached.

* Attach additional pages as needed.

Date 08-29-2024

Signature P LaRose

Print Name Pshatria LaRose

Address 21033 McKinney Ave # 730

City, State, Zip Dallas, TX 75204

Telephone 404 450 7210

STATE OF TEXAS

FEDERAL COURT

DALLAS COUNTY

Pshatoia LaRose
2633 McKinney Ave #233
Dallas, TX 75204

Petitioner

V.

3-24CV2242-L
Case No. _____

Sean Combs
Ciroc
Combs Enterprises
The Sean Combs Foundation
Attn: 1505 Corporation
E Resident Agent Inc
9000 Sunset Blvd
Los Angeles, CA 90069

Respondent

PETITION AND COMPLAINT

COMES NOW, Petitioner Pshatoia LaRose, and states the following:

Plaintiff alleges that Respondent, Sean Combs through the entities of Ciroc, Combs Enterprise, The Sean Combs Foundation, as well as individually, committed the acts of violating the Trade Secrets Act of 2016, Intellectual Property Rights of Plaintiff's phone contents and conversations, which were re-used in publications, as well as the invasion of privacy and harassment. All 4 Defendants are included in this complaint. The Respondent caused harm and loss to Plaintiff both directly and indirectly through third party associations, horoscope script writings, and Respondent's brand. As a result of Respondent's actions, Petitioner has experienced severe financial loss and pain and suffering which has resulted in irreparable harm and loss to Petitioner. Plaintiff seeks damages of \$521 million. Plaintiff is requesting a Jury Trial.

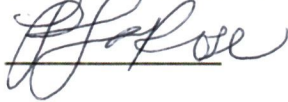
Defendant has also violated the Lanham Act, which provides that "Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which—(A) is likely to cause confusion,

or to cause mistake, or to deceive as to the affiliation, connection, or association of such person with another person, or as to the origin, sponsorship, or approval of his or her goods, services, or commercial activities by another person." 15 U.S. C. § 1125(a)(1). Defendant allowed for infringement of Plaintiff's image and personal property through its ineffective protection of her data privacy, and is thus liable under the Lanham Act.

Plaintiff, Pshatoia LaRose has proceeded with filing Restraining Order against Defendant for continuous Stalking, Spying and Unauthorized Phone Tapping and Hacking in which Plaintiff is seeking to proceed with Criminal Charges as well as Civil.

Petitioner respectfully asks this Court for damages owing from Defendant's conduct, as well as for an order for Respondent to disclose all Companies, Brands, Horoscope Websites that he operates or is associated with including Third Parties, as well as for any other relief that this Court may deem proper.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'P. LaRose', written over a horizontal line.

Pshatoia LaRose
Plaintiff

MAG. JUDGE